

# EXHIBIT J

Acknowledgement by an Attorney-at-law pursuant to  
42 Pa.C.S. § 327

State of Pennsylvania


County of Philadelphia

This record was acknowledged before me on (date) December 1, 2019

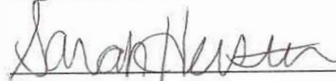
By Seth Carson, Esq.

Supreme Court ID No.: 319886

As a member of the bar of the Pennsylvania Supreme Court certified that he/she was personally  
present when Patricia McNulty executed the record and that

 executed the record for the purposes contained therein.

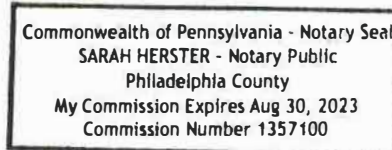
Signatures of notarial officer



Stamp

Title of office

My commission expires:



<b>CHARGE OF DISCRIMINATION</b>		AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.		<input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
Dual filed with the Pennsylvania Human Relations Commission _____ and EEOC & Philadelphia Commission on Human Relations _____ State or local Agency, if any			
NAME (Indicate Mr., Ms., Mrs.) Patricia McNulty		HOME TELEPHONE (Include Area Code) 215.910.2154	
STREET ADDRESS 349 E 48th Street, New York, NY 10017		CITY, STATE AND ZIP CODE DATE OF BIRTH 4-1-1982	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME Middle East Forum		NUMBER OF EMPLOYEES, MEMBERS 25 plus	
		TELEPHONE (Include Area Code) 215.546.5406	
STREET ADDRESS 1650 Market Street, Suite 3600 Philadelphia PA 19103		CITY, STATE AND ZIP CODE COUNTY Philadelphia	
NAME Greg Roman, Daniel Pipes, Matthew Bennett		TELEPHONE NUMBER (Include Area Code) 215.546.5406	
STREET ADDRESS 1650 Market Street, Suite 3600 Philadelphia PA 19103		CITY, STATE AND ZIP CODE COUNTY Philadelphia	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))		DATE DISCRIMINATION TOOK PLACE	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify)		October 2017 to Present  <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): Charging Party, Patricia McNulty was subjected to a severe and pervasive atmosphere of discrimination and harassment in the workplace. Charging Party now files this Charge of Discrimination against the above named Respondents, Middle East Forum, Greg Roman, Daniel Pipes, and Matthew Bennett. Charging Party was employed at the Middle East Forum from October 2017 until her unlawful termination by constructive discharge September 2019. Charging Party Patricia McNulty notified Respondents that she could no longer tolerate working in such hostile work conditions and resigned her position at the Middle East Forum to avoid further discrimination and harassment and retaliation to which Charging Party was subjected by Respondents during her employment. Charging Party's resignation letter notified Respondents that she could no longer tolerate the severe and pervasive discrimination and harassment which caused Charging Party to suffer physical and mental distress. Charging Party reported the discrimination and harassment and was subjected to further retaliation. Charging Party hereby would ask the EEOC and Pennsylvania Human Relations Commission to consider her previously filed Charge of Discrimination which was assigned the Charge number 530-2019-04521. When this Charge was filed in June 2019, Charging Party had not yet been constructively discharged from her employment. After filing her Charge, Charging Party was subjected to further discrimination, harassment and retaliation. Charging Party attempted to continue her employment at the Middle East Forum however, Respondents initiated a campaign of retaliation against Charging Party pursuant to Charging Party's reports of discrimination and harassment and her attempts to vindicate her rights by filing a Charge of Discrimination, previous Charge number identified above. Charging Party was subjected to tangible employment actions. Charging Party's position with the Middle East Forum was changed and altered. Charging Party's ability to do the work that she was responsible for changed at Respondents subjected Charging Party to further discrimination and harassment and retaliation by reassigning Charging Party or subjecting Charging Party to discipline. Charging Party was threatened. Charging Party was ignored. The entire office changed after Charging Party filed her Charge and it was communicated to Charging Party without any ambiguity that Charging Party was no longer welcome at the Middle East Forum. Charging Party was made to understand that she was not welcome at the Middle East Forum and that Charging Party's future at the Middle East Forum would afford Charging Party no opportunity for advancement and indeed Charging Party would not even be permitted to perform the same responsibilities that she performed prior to Charging Party submitting a Charge of Discrimination at the EEOC and PHRC. Respondents disparate treatment and retaliation against Charging Party and the hostile work environment that began October 2017 culminated in a tangible employment action: Charging Party's termination. Charging Party was not allowed to apply for a position of Director of Development. Charging Party was the acting Director of Development and the obvious choice for succession to the position. As soon as Charging Party applied for the position, Respondents discontinued canvassing for the position and Charging Party was expected to continue to perform the responsibilities of the position without any compensation of benefits. Charging Party was afforded \$1000.00 a month but Charging Party was no longer allowed to be a candidate for the position. Charging Party was reprimanded and issued verbal warnings for no reason other than retaliation. All support for Charging Party was withdrawn. Respondents refused to communicate with Charging Party.			
I want this charge filed with both the EEOC and the State or local Agency, if any I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary for State and Local Requirements)	
I declare under penalty of perjury that the foregoing is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
12/1/19 Date Patricia McNulty Charging Party (Signature)		SIGNATURE OF COMPLAINANT 12/1/19 SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)	

EEOC FORM 5 (REV. 3/01)

McNulty EEOC Docs 00002



**INFORMATION FOR COMPLAINANTS & ELECTION OPTION TO DUAL FILE WITH THE  
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

Case Name: Patricia McNulty v. Middle East Forum

EEOC Charge Number: \_\_\_\_\_

You have the right to dual file this EEOC charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in a manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you also want your EEOC charge filed with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not conduct a separate investigation and, in most cases, will accept EEOC's findings. If you disagree with PHRC's adoption of EEOC's findings, you will have the chance to file a request for preliminary hearing with PHRC.

Since you have chosen to initially file your charge with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year from filing with PHRC, you have the right to file your complaint in State court. PHRC will inform you of these rights and obligations at that time.

**SIGN AND DATE APPROPRIATE REQUEST BELOW**

I want my charge dual filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request that EEOC transmit a copy to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

X Patricia McNulty

Signature and Date

**OR**

I do not want my charge dual filed with PHRC.

\_\_\_\_\_  
Signature and Date





June 20, 2019

*Via Email: "EEOC Philadelphia" <philatty@eeoc.gov>*

Equal Employment Opportunity Commission

801 Market Street

Suite 1300

Philadelphia, PA 19107-3127

Attention: Intake Unit

Re:                      Our Client        :        Patricia McNulty  
                                 Nature of Complaint :        Discrimination, Harassment & Retaliation

-against-

Middle East Forum

Daniel Pipes

Greg Roman

Matthew Bennett

(collectively "Respondents").

Dear Sir or Madam:

The following Charge of discrimination and retaliation is filed on behalf of our client, Patricia McNulty against the Middle East Forum, Daniel Pipes, Greg Roman, and Matthew Bennett, (hereinafter "Respondents").

We request this Charge be dual filed with the Pennsylvania Human Relations Commission, the Philadelphia Commission on Human Relations and any other state or local agency with whom the EEOC has a work sharing agreement. Charging Party makes her claim under all applicable rules, regulations, statutes and ordinances relevant to the facts provided.

New York City Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760  
Philadelphia Office: 1835 Market Street, Suite 2950, Philadelphia, PA 19103 | (215) 391-4790  
Miami Office: 100 SE 2nd Street, Suite 2000, Miami, FL 33131 | (305) 946-1884  
New Jersey Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625  
Website: [www.discriminationandsexualharassmentlawyers.com](http://www.discriminationandsexualharassmentlawyers.com)

**McNulty EEOC Docs 00005**

Upon information and belief Charging Party, Patricia McNulty avers the following:

**PARTIES**

1. Charging Party, Patricia McNulty (“Charging Party”) is an adult individual who resides in the Commonwealth of Pennsylvania with an address for purposes of correspondence at 512 S 5<sup>th</sup> Street, Philadelphia, Pennsylvania 19147.
2. Respondent, Middle East Forum is a non-profit organization which is licensed to and regularly transacts business in the Commonwealth of Pennsylvania with offices for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
3. Respondent, Daniel Pipes is an adult individual who resides in the Commonwealth of Pennsylvania with a business address for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
4. At all times relevant to this Charge, Respondent, Daniel Pipes was employed by Respondents, held the title President, and held supervisory authority over Charging Party, Patricia McNulty.
5. Respondent, Greg Roman is an adult individual who resides in the Commonwealth of Pennsylvania with a business address for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
6. At all times relevant to this Charge, Respondent, Greg Roman was employed by Respondents as the Director of the Middle East Forum and held supervisory authority over Charging Party, Patricia McNulty.

7. Respondent, Matthew Bennett is an adult individual who resides in the Commonwealth of Pennsylvania with a business address for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
8. At all times relevant to this Charge, Respondent, Matthew Bennett was employed by Respondents and held supervisory authority over Charging Party, Patricia McNulty.
9. At all times relevant to this Charge Respondents were Charging Party's joint and sole employer.

### **MATERIAL FACTS**

10. Charging Party, Patricia McNulty ("Charging Party") began her employment for Respondents, Middle East Forum, Daniel Pipes, Greg Roman, and Mathew Bennett (collectively "Respondents") sometime around October 23, 2017.
11. Charging Party was hired as a Program Manager.
12. Today Charging Party is the Acting Director of Development. Charging Party also holds the title Program Director.
13. Respondents are currently interviewing for a fulltime Program Director.
14. Charging Party was invited to apply for the Program Director position by Respondent, Daniel Pipes, however, to fulfill the requirements of this position, Charging Party would have to work directly with Respondent, Greg Roman.
15. Respondent, Greg Roman is currently the Director of the Middle East Forum.
16. Respondent, Daniel Pipes is currently the President of the Middle East Forum.
17. March 2018, Charging Party attended a conference in Washington DC. This conference was the American Israel Public Affairs Committee ("APAC").



18. Others in attendance included Respondent, Greg Roman, Respondent, Mathew Bennett, coworker Lisa Barbounis, and coworker, Marnie Meyer.
19. Respondent, Greg Roman and Respondent, Mathew Bennett booked an Airbnb in Washington D.C. for the APAC Conference.
20. Charging Party booked a hotel room for the APAC Conference.
21. The other female employees at Middle East Forum also booked hotel rooms for the APAC Conference.
22. After dinner, Respondent, Greg Roman invited Grantees from The Pinsky Center and a writing fellow named Raheem Kassam back to his Airbnb.
23. Respondent, Greg Roman sat on the couch between Charging Party, Patricia McNulty and coworker, Lisa Barbounis.
24. Respondent, Greg Roman proceeded to put his arms around both Charging Party, Patricia McNulty and coworker, Lisa Barbounis.
25. Respondent, Greg Roman grabbed Charging Party by her upper thigh and violently yanked Charging Party onto his lap. Respondent, Greg Roman then began whispering inappropriate sexual advances in Charging Party's ear.
26. Respondent, Greg Roman informed Charging Party that there was no need for any other men to be in the room. Respondent, Greg Roman then informed Charging Party, "you know why!"
27. Charging Party tried to pull away from Respondent, Greg Roman who resisted Charging Party's attempts to escape from Respondent, Greg Roman's grip.
28. Charging Party had to fight to get away.

29. Once Charging Party was able to get away, Charging Party left the room and entered the kitchen area.
30. Respondent, Greg Roman sexually assaulted Charging Party, Patricia McNulty at the APAC conference when he violently yanked Charging Party across the couch, onto his lap, and whispered inappropriate, unwelcome sexual advances in Charging Party's ear.
31. Prior to the sexual assault at the APAC Conference, Respondent, Greg Roman subjected Charging Party to severe and pervasive discrimination and harassment based upon Charging Party's sex and gender.
32. Respondent, Greg Roman screamed at Charging Party. Respondent, Greg Roman cursed at Charging Party. Respondent, Greg Roman did not treat Charging Party's similarly situated male coworkers in this discriminatory, abusive, hostile and intolerable manner.
33. Respondent, Greg Roman also subjected Charging Party's coworker, Lisa Barbounis to severe and pervasive discrimination and harassment based upon her sex and gender.
34. Respondent, Greg Roman also subjected Charging Party's coworker, Caitriona Brady to severe and pervasive discrimination and harassment based upon her sex and gender.
35. Respondent, Greg Roman also subjected Charging Party's coworker, Delaney Yonchek to severe and pervasive discrimination and harassment based upon her sex and gender.
36. In April 2018, Respondent, Greg Roman and Charging Party's coworker, Lisa Barbounis were sent to Israel for business meetings. This was a work trip organized through and for the Middle East Forum.
37. Respondent, Greg Roman ordered Lisa Barbounis to not tell anyone that Lisa Barbounis was accompanying Respondent, Greg Roman on the trip.

38. Respondent, Greg Roman insisted that Lisa Barbounis share an Airbnb with him. Lisa Barbounis agreed on the condition that they book a two-bedroom Airbnb. This was a specific condition because Respondent, Greg Roman would not take Lisa Barbounis on the Israel trip unless she agreed to share an Airbnb with him. Lisa Barbounis wanted the opportunity to travel to Israel and therefore made certain that Respondent, Greg Roman booked a two-bedroom Airbnb.
39. Respondent, Greg Roman asked Marnie Meyer to go on the trip before he asked Lisa Barbounis. When Marnie Meyer informed Respondent, Greg Roman that she wanted to have her own hotel room, Respondent, Greg Roman said, “just forget it.”
40. Before the Israel trip, Respondent, Greg Roman instructed Lisa Barbounis not to tell anyone that she was coming on the trip. Respondent, Greg Roman said, “Don’t tell your family. Don’t tell Daniel. Don’t tell anyone in the office.”
41. While on the trip, Lisa Barbounis was sitting on the couch in living room/entertainment room of the Airbnb when Respondent, Greg Roman sat down next to Lisa Barbounis. Respondent, Greg Roman then put his legs on the couch and put his feet under Lisa Barbounis’s backside.
42. Respondent, Greg Roman then said: “now that my foot is on your ass we have reached a new level.” Lisa Barbounis got up, walked away and tried to laugh it off. Lisa Barbounis was highly uncomfortable at the obviously sexual, inappropriate and unwelcome advance.
43. The next evening, Respondent, Greg Roman left the Airbnb to go out. Lisa Barbounis stayed home to work and finish a Power Point.

44. Respondent, Greg Roman arrived home and confessed to Lisa Barbounis that he had a sexual relationship with a current intern in the Israel office for the Middle East Forum named, Leah Merville.
45. Respondent, Greg Roman secured Leah Merville's internship in Israel. Respondent, Greg Roman secured Leah Merville's internship in Israel based upon a *quid pro quo* sexual harassment. Respondent, Greg Roman informed Lisa Barbounis that when Leah Merville visited Respondent Greg Roman's hotel room to sign the internship papers, "that's when I fucked her."
46. Respondent, Greg Roman continued to describe the sexual harassment to Lisa Barbounis. Respondent, Greg Roman said that Leah Merville gives a really great blowjob. Respondent, Greg Roman said, "her body is so tight." Respondent, Greg Roman continued to describe in detail his sexual relationship to Lisa Barbounis.
47. Lisa Barbounis was highly offended and scared to be alone with Respondent, Greg Roman.
48. Respondent, Greg Roman informed Lisa Barbounis that he attempted to make contact with Leah Merville that night. Respondent, Greg Roman explained that he desired to continue the sexual relationship with the intern, Leah Merville. However, Respondent, Greg Roman said that Leah Merville was ignoring his calls.
49. Respondent, Greg Roman then directed his sexual advances toward Lisa Barbounis. Respondent, Greg Roman informed Lisa Barbounis, "I just need a sexual release." Respondent, Greg Roman informed Lisa Barbounis, "I really need a blowjob."
50. The entire time that Respondent, Greg Roman spoke to Lisa Barbounis, he aggressively paced the room and said, I just need a blow job. I just need a release.

51. Lisa Barbounis was scared, offended, harassed, modified, and creeped out.
52. Respondent, Greg Roman's aggressive sexual conduct became more aggressive.  
Respondent, Greg Roman's voice got louder as he continued to visit his sexual advances upon Lisa Barbounis.
53. Respondent, Greg Roman was Lisa Barbounis's and Charging Party's direct supervisor.
54. Respondent, Greg Roman employed policies, procedures and protocols designed to create a barrier between Charging Party and President Daniel Pipes. This barrier was aimed at limiting the opportunities that Charging Party had to report Respondent, Greg Roman's unwelcome sexual conduct and comments.
55. Pursuant to the sexual advances described above and the assault on Charging Party, Respondent, Greg Roman began subjecting Charging Party to discrimination and harassment in the office based upon Charging Party's sex and gender.
56. Respondent, Greg Roman followed Charging Party around the office. Respondent, Greg Roman entered Charging Party's office when she was not present and explored her computer including personal emails, chat history, and internet browser history.  
Respondent, Greg Roman also asked other employees to spy on Charging Party.
57. Respondent, Greg Roman kept tabs on the number of times that Charging Party used the bathroom.
58. Respondent, Greg Roman subjected Charging Party to severe and pervasive discrimination and harassment based upon her sex and gender. This discrimination and harassment was evident in the way that Respondent, Greg Roman spoke to Charging Party, the assignments he provided, his tone of voice, body language, expressions,

cursing, and other threatening conduct. Respondent, Greg Roman created a hostile work environment for Charging Party.

59. Charging Party reported the discrimination and harassment to which she was subjected by Respondent, Greg Roman to Lisa Barbounis. Lisa Barbounis notified Marnie Meyer. Marnie Meyer prepared a handwritten letter addressed to Daniel Pipes and provided same on November 1, 2018.
60. Respondent, Daniel Pipes spoke to Charging Party the same day and Charging Party reported the discrimination and harassment and sexual assault at the APAC conference in Washington D.C.
61. Charging Party also described to Respondent, Daniel Pipes the way that Respondent, Greg Roman's behavior changed significantly after Charging Party rejected his unwelcome sexual advances and assault.
62. In addition to the reports of discrimination and harassment which Charging Party provided, several other employees at the Middle East Forum also spoke to Respondent, Daniel Pipes on November 1, 2018.
63. By at least November 1, 2018, Respondent Daniel Pipes learned about Respondent, Greg Roman's discrimination and harassment to which he subjected the female staff employed by the Middle East Forum. This included the incident at the APAC Conference when Respondent, Greg Roman sexually assaulted Charging Party. This also included the incident in Israel when Respondent, Greg Roman subjected Lisa Barbounis to unwelcome lewd sexual advances.
64. After Respondent, Daniel Pipes learned about the ongoing severe and pervasive discrimination and harassment, he notified Charging Party Patricia McNulty, Marnie



Meyer, Lisa Barbounis, and Respondent, Mathew Bennett that nothing was going to be done to ameliorate the discrimination and harassment. Respondent, Daniel Pipes said, “priests have been accused of more and not lost their jobs.”

65. Accordingly, Respondent, Daniel Pipes notified the office that the standard at the Middle East Forum for discipline pursuant to anti-discrimination laws was not reached by Respondent, Greg Romans severe and pervasive conduct and comments. This includes the sexual assault of Charging Party.
66. Accordingly Respondent, Daniel Pipes initiated no discipline and no corrective action was taken.
67. Charging Party, Marnie Meyer, Lisa Barbounis, and Respondent, Mathew Bennett were instructed to work from home the following Friday.
68. Respondent, Daniel Pipes also instructed Charging Party Patricia McNulty, Marnie Meyer, Lisa Barbounis, and Respondent, Mathew Bennett to execute new Nondisclosure Agreements. Charging Party and Lisa Barbounis refused to sign.
69. Saturday, November 3, 2018, Charging Party received an email from Respondent, Daniel Pipes instructing Charging Party to attend a group meeting scheduled Monday, November 5, 2018. This memorandum was sent as a group email to Charging Party and her coworkers. Respondent, Greg Roman was included in the email and invitation to attend the group meeting.
70. In fact, Respondent, Greg Roman was specifically asked to attend the group meeting. It was not until Monday, November 5, 2018 when a call was made to Respondent, Greg Roman asking that he stay home.

71. Notwithstanding, Respondent, Greg Roman's sister attended the meeting and spent the entire meeting suggesting that the woman who Respondent, Greg Roman sexually harassed were at fault for wearing short skirts. This meeting is indicative of Respondent, Daniel Pipes utter failure to bring his organization into compliance with state and federal anti-discrimination laws.
72. After the November 5, 2018 meeting, Respondent, Daniel Pipes decided that Respondent, Greg Roman would retain his position, title, pay, and employment with the Middle East Forum.
73. Respondent, Daniel Pipes notified Charging Party that Respondent, Greg Roman would work from home and that Charging Party would no longer directly report to Respondent Greg Roman. However, this is not what occurred
74. For the next four to five months, Charging Party was forced to continue working with Respondent, Greg Roman. The only change was that Respondent, Greg Roman did not visit the office anymore. Charging Party was still subjected to working directly with Respondent, Greg Roman
75. Charging Party was still subjected to the same discrimination and harassment when she was forced to work with Respondent, Greg Roman.
76. Moreover, Respondent, Greg Roman initiated a campaign of retaliation targeting the employees who Respondent, Greg Roman called "the usurpers." Respondent Greg Roman also called them the "backstabbers."
77. Respondent, Greg Roman notified Respondent, Mathew Bennett, "they are all usurpers and I will never work with usurpers." Even more recently, Respondent, Greg Roman announced on a radio show that "all usurpers should be crushed."

78. Charging Party was therefore forced to continue working with and taking orders from Respondent, Greg Roman.
79. Respondent, Greg Roman began a campaign of retaliation aimed at Charging Party and the other female employees in the office who reported discrimination and harassment including Marnie Meyer and Lisa Barbounis.
80. Sometime around March 2019, Respondent, Daniel Pipes ordered Marnie Meyer, Lisa Barbounis and Charging Party, Patricia McNulty into a meeting where Respondent, Daniel Pipes announced that Respondent, Greg Roman was moving back to a position where he would begin working directly with Charging Party and the other female employees Respondent, Greg Roman harassed.
81. At all times Respondent, Greg Roman retained the position of Director of the Middle East Forum.
82. At all times, Charging Party was forced to continue working at the Middle East Forum with Respondent, Greg Roman.
83. In the March 2019 meeting, Respondent, Daniel Pipes announced that he was going to eliminate the purported safe measures initiated to protect the female staff from Respondent, Greg Roman's severe and pervasive discrimination, harassment, and retaliation.
84. Accordingly, since March 2019, Respondent, Greg Roman's contact with the female staff including Charging Party has continued to increase.
85. Respondent, Greg Roman's campaign of retaliation since March 2019 has been aimed at effecting Charging Party's termination from the Middle East Forum. Respondent Greg Roman called Respondent, Mathew Bennett and breached the nondisclosure agreement by

informing Respondent, Matthew Bennett that Charging Party is terrible at her job.

Respondent, Greg Roman also said that Charging Party is in over her head. Respondent,

Greg Roman also said that Charging Party will never succeed in her position.

86. This was also around the time when Charging Party learned that another allegation of sexual harassment had been made involving Respondent, Greg Roman.

87. Respondent, Greg Roman began a rumor that Marnie Meyer was having a sexual relationship with Caitriona Brady's father.

88. Caitriona Brady is an employee at the Middle East Forum who holds the position Development Associate. When Respondent, Greg Roman learned that another allegation was reported involving him, Respondent, Greg Roman did not yet know the details of the allegation. Accordingly, Respondent, Greg Roman and Respondent, Mathew Bennett began a guessing game where they attempted to guess what the allegation involved. Respondent, Greg Roman incorrectly guessed that the sexual harassment allegation involved a former intern named Gabrielle Bloom who Respondent, Greg Roman paid to have sex with.

89. Accordingly, Respondent, Greg Roman subjected two female interns to *quid pro quo* sexual harassment, as well as subjecting Charging Party to a sexual assault.

90. Just days after the March 2019 meeting when Respondent, Daniel Pipes announced that he was eliminating the measures designed to protect female staff from Respondent Greg Roman, Respondent, Greg Roman called Respondent, Mathew Bennett. Respondent, Greg Roman informed Respondent, Matthew Bennett, "now that I am back, I am going to begin searching for a replacement for the Director of Development."

91. This was Charging Party's position.

92. Charging Party reported this retaliation to Respondent, Daniel Pipes. Respondent, Daniel Pipes' response was "Why are complaining to me. Go complaint to Greg."
93. Respondent, Daniel Pipes' instruction to Charging Party directly controverted the policies that were purportedly in place whereby Charging Party was not supposed to have to report anything directly to Respondent, Greg Roman.
94. At present, Charging Party is subjected to a severe and pervasive atmosphere of discrimination and harassment based upon her sex and gender and in retaliation for Charging Party's reports and opposition to Respondents sexual harassment and discrimination and harassment of Charging Party.
95. Charging Party continues her attempts to report and obtain assistance from Respondent, Daniel Pipes.
96. Respondent, Daniel Pipes continues to protect, shield, indemnify and assist Respondent, Greg Roman from any and all impact caused by his severe and pervasive discrimination and harassment.
97. Accordingly, Respondent, Daniel Pipes has condoned, sanctioned, permitted, and allowed the discrimination, harassment, and retaliation to continue.
98. Respondents have made Charging Party's working conditions so onerous, abusive, and intolerable that no person in Charging Party's shoes should be expected to continue working under such conditions.
99. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed.
100. As a result of Respondents' conduct, Charging Party was caused to sustain serious and permanent personal injuries, including permanent psychological injuries. As a result of

Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed.

101. As a result of the acts and conduct complained of herein, Charging Party has suffered and will continue to suffer a loss of income, loss of salary, bonuses, benefits and other compensation to which such employment entailed.
102. Charging Party also suffered future pecuniary losses, emotional pain, humiliation, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Charging Party has further experienced severe emotional and physical distress.
103. As Respondents' conduct has been malicious, willful, outrageous, and conducted with full knowledge of the law, Charging Party demands Punitive Damages as against all the Respondents, jointly and severally.
104. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation. At all times material Respondents refused to investigate or take appropriate remedial action in response to Charging Party's complaints of discrimination, harassment and hostile work environment.
105. Respondents discriminatory conduct was severe and pervasive, and created a hostile work environment for Charging Party.
106. The above are just some examples of some of the discrimination and retaliation to which Respondents subjected Charging Party.
107. Charging Party claims a pattern and practice of discrimination, claims continuing violations, and makes all claims herein under the continuing violations doctrine. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation.



Please contact me if you have any questions or require any additional information. Thank you for your courtesy and cooperation in the matter.

Very truly yours,

**DEREK SMITH LAW GROUP, PLLC**

BY: /s/ Seth D. Carson  
Seth D. Carson, Esquire  
1835 Market Street  
Suite 2950  
Philadelphia, PA 19103

DATED: June 20, 2019



EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To:      Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
<u>PHBC and Philadelphia Commission Human Relations</u> and EEOC <small>State or local agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) <u>Ms Tricia McNulty (Patricia)</u>		Home Phone (Incl. Area Code) <u>609-742-1968</u>	Date of Birth <u>4-1-1982</u>
Street Address      City, State and ZIP Code <u>512 South 5th Street Philadelphia PA 19147</u>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <u>Middle East Forum</u>		No. Employees, Members <u>25 - plus</u>	Phone No. (Include Area Code) <u>215-546-5406</u>
Street Address      City, State and ZIP Code <u>1650 Market Street Suite 3600, Philadelphia PA 19103</u>			
Name <u>Gregg Roman &amp; Daniel Pipes</u>		No. Employees, Members <u>25 - plus</u>	Phone No. (Include Area Code) <u>215-546-5406</u>
Street Address      City, State and ZIP Code <u>1650 Market Street Suite 3600 Philadelphia PA 19103</u>			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest      Latest <u>October 2017 - Present</u> <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):  <p>To be dual filed with the Philadelphia Commission on Human Relations and the Pennsylvania Human Relations Act. Charging Party, Lisa Barbounis submits this Charge of Discrimination against Respondents. Charging Party has prepared a separate Charge form of which this is the cover page.</p> <p>Charging Party was subjected to discrimination, harassment and retaliation based upon her sex and gender. The discrimination and harassment was severe and pervasive and created a hostile work environment.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements <u>Thomas Sullivan</u>	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT <u>Patricia McNulty</u>	
<u>06/07/19</u> <u>Patricia McNulty</u> Date      Charging Party Signature		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) <u>06/07/19</u>	
		Commonwealth of Pennsylvania - Notary Seal <b>THOMAS SULLIVAN, Notary Public</b> Philadelphia County My Commission Expires March 11, 2023 Commission No. 1347443	

McNulty EEOC Docs 00022

EEOC Form 5 (11/09)

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA  
☒ EEOC

and EEOC

State or local Agency, if any

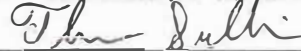
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

X 06/07/19 Patricia McNulty  
 Date Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements



I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

X Patricia McNulty  
 SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
 (month, day, year)

06/07/19

Commonwealth of Pennsylvania - Notary Seal  
 THOMAS SULLIVAN, Notary Public  
 Philadelphia County  
 My Commission Expires March 11, 2023  
 Commission No. 1247443

McNulty EEOC Docs 00023

**INFORMATION FOR COMPLAINANTS & ELECTION OPTION TO DUAL FILE WITH THE  
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

Case Name: Patricia McNulty v. Middle East Forum

EEOC Charge Number: \_\_\_\_\_

You have the right to dual file this EEOC charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in a manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you also want your EEOC charge filed with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not conduct a separate investigation and, in most cases, will accept EEOC's findings. If you disagree with PHRC's adoption of EEOC's findings, you will have the chance to file a request for preliminary hearing with PHRC.

Since you have chosen to initially file your charge with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year from filing with PHRC, you have the right to file your complaint in State court. PHRC will inform you of these rights and obligations at that time.

**SIGN AND DATE APPROPRIATE REQUEST BELOW**

I want my charge dual filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request that EEOC transmit a copy to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

X Patricia McNulty

Signature and Date

**OR**

I do not want my charge dual filed with PHRC.

\_\_\_\_\_  
Signature and Date